

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HOLLY YENCHA, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

ZeoBIT LLC, a California limited liability  
company,

*Defendant.*

Case No. 2-14-cv-00578-JFC

Honorable Joy Flowers Conti

**PLAINTIFF’S MOTION FOR APPROVAL OF  
ATTORNEYS’ FEES, EXPENSES, AND INCENTIVE AWARD**

Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiff Holly Yencha (“Plaintiff”), respectfully requests that the Court enter an Order approving her request for an award of reasonable attorneys’ fees and expenses to Class Counsel, and an incentive award for her role as Class Representative in connection with the Parties’ proposed class action settlement of this matter. Plaintiff’s motion is based up on her Memorandum of Law (and the exhibits attached thereto) in support of the motion and the record in this matter, along with any oral argument that may be presented to the Court and evidence submitted in connection therewith.

WHEREFORE, Plaintiff Holly Yencha, individually and on behalf of the Settlement Class, respectfully requests that the Court enter an Order (1) approving an award of \$660,000.00 in attorneys’ fees and expenses to Class Counsel, (2) approving an incentive award of \$1,000.00 in recognition of her efforts on behalf of the Settlement Class, and (3) providing such other and further relief as the Court deems reasonable and just.

Respectfully submitted,

**HOLLY YENCH**A, individually, and on behalf of  
a class of similarly situated individuals,

Dated: September 7, 2015

By: /s/ Benjamin H. Richman  
One of Plaintiff's Attorneys

Rafey S. Balabanian (IL 6285687)\*  
rbalabanian@edelson.com  
Benjamin H. Richman (IL 6300668)\*  
brichman@edelson.com  
Courtney C. Booth (IL 6312384)\*  
cbooth@edelson.com  
EDELSON PC  
350 North LaSalle Street, Suite 1300  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378

William R. Caroselli (PA 00452)  
wcaroselli@cbmclaw.com  
CAROSELLI BEACHLER McTIERNAN & CONBOY LLC  
20 Stanwix Street, 7th Floor  
Pittsburgh, Pennsylvania 15222  
Tel: 412.391.9860  
Fax: 412.391.7453

*\*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I, Benjamin H. Richman, an attorney, hereby certify that on September 7, 2015, I served the above and foregoing ***Plaintiff's Motion for Approval of Attorneys' Fees, Expenses, and Incentive Award*** by causing a true and accurate copy of such paper to be filed with the Court and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Benjamin H. Richman \_\_\_\_\_